

RESPONSE TO COMMENTS

**Response to U.S. Environmental Protection Agency Comments
Draft-Final Site Investigation Report, Former Washrack, Building 1740,
Soldier's Chapel, Parcel 127(7) (dated August 2002)
Fort McClellan, Calhoun County, Alabama**

Comments from Doyle T. Brittain, Senior Remedial Project Manager, dated October 11, 2002.

General Comment

Comment 1: Constituents were eliminated as COPCs based on comparison to the range of background concentrations detected for each specific constituent. The only appropriate comparison using background should be comparison of the maximum concentration of the constituent to 2 times the mean background concentration. Therefore, any constituent eliminated as a COPCs based solely on comparison to the background range should be re-included as COPCs.

Response 1: Comment noted. Upper background range values were removed from the report and the metals results were screened against two times the mean background concentration. COPCs were re-evaluated using the 2X mean background values and the report was revised accordingly.

Specific Comments

Comment 1: Figure 4-3. This figure was omitted from the SI Report. It should be inserted.

Response 1: Comment noted. The figure was included in the revised document.

Comment 2: Page 5-8, Section 5.6. This section focuses on the weight-of evidence evaluation for the human health risk assessment but fails to address the COPCs exceeding ESVs. Text should be added to this section addressing ecological risks for COPCs exceeding ESVs.

Response 2: Agree. A weight-of-evidence evaluation addressing ecological risks was added to the revised document.

Comment 3: Page 5-7, Line 11. The text states that one carbon tetrachloride detection (0.0094 mg/L) slightly exceeded the EPA MCL of 0.005 mg/L but the use of a more reasonable EPC based on the arithmetic mean was below the MCL. First, a concentration of 00094 mg/L should not be considered to "slightly" exceed the MCL. Second, the text should include the calculated 95% UCL, which is stated as being more reasonable for use than the MDC.

Response 3: Agree. The text was revised per comment.

Comment 4: Page 5-8, Line 2. The text states that antimony and chromium results (5.81 and 59.2 mg/kg, respectively) only minimally exceeded their SSLs (3.11 and 23.2 mg/kg, respectively) and upper background ranges (2.6 and 55 mg/kg, respectively). First, the concentrations of antimony and chromium were almost double that of their respective SSLs and thus, are not “minimal exceedances”. Second, while the use of upper background ranges provides additional insight, the fact that antimony and chromium exceeded their upper background range seems to indicate that their may be a problem with surface soil sample (PPMP-127-GP22) and this potential “hot spot” should be addressed.

Response 4: Comment noted. The text was revised to accurately describe the magnitude of the concentrations above SSLs.

Regarding the second part of the comment, the reviewer should refer to Appendix A of the SI report. As shown on Figure A-4 and as described in the Interim Soil Removal Action Report, sample location PPMP-127-GP22 was excavated during the removal action. Confirmatory sampling indicated that "hot spot" removal was successfully accomplished.

Comment 5: Page 6-1, Line 35. It is stated that concentrations of nine metals exceeded their ESVs and their upper background ranges in one or more surface and depositional soil samples. The only appropriate comparison using background should be comparison of the maximum concentration of the constituent to 2 times the mean background concentration. Therefore, any metal eliminated as a COPCs based solely on comparison to the background range should be re-included as COPCs.

Response 5: See response to General Comment No. 1.

Comment 6: Page 6-2, Line 4. The text states that the site does not support significant ecological habitat and therefore, the potential threat to ecological receptors is expected to be very low. The issue regarding whether the ecological habitat is “significant” or not is not the important consideration regarding ecological risk. Rather, the issue of concern at this point in the ERA is constituents exceeding their respective ESVs. It is appropriate to address the type of habitat available and identify the potential ecological receptors that are at risk from site constituents and then address the potential for risks to site receptors. The text should be edited to more clearly state the potential ecological risk present at this site.

Response 6: Comment noted. The text was revised to more clearly state potential ecological risk at this site.

**Response to Alabama Department of Environmental Management Comments
Draft-Final Site Investigation Report, Former Washrack, Building 1740,
Soldier's Chapel, Parcel 127(7) (dated August 2002)
Fort McClellan, Calhoun County, Alabama**

Comments from Stephen A. Cobb, Chief, Hazardous Waste Branch, Land Division, as presented in a letter to Ron Levy, BRAC Environmental Coordinator, dated July 7, 2004.

General Comments

The Alabama Department of Environmental Management (ADEM or the Department) has completed a review of the *Draft-Final Site Investigation (SI) Report Range, Former Washrack, Building 1740, Soldier's Chapel, Parcel 127(7)*. It appears from the supporting data in the report that Fort McClellan's interim soil removal action has adequately addressed soil contamination at this parcel. The Department concurs with the no further action recommendation at this time regarding soil contamination. However ADEM also notes that groundwater sampling conducted at this site indicates that arsenic, lead, manganese, benzene, carbon tetrachloride, and chloroform are present in the site groundwater at concentrations exceeding federal drinking water standards; therefore, land use controls restricting groundwater usage should be implemented at the site.

The Department does not concur with Fort McClellan's recommendation to release the site for unrestricted reuse. Based upon the evidence of groundwater contamination, the Department requests that the Army implement a land use control plan to appropriately restrict future groundwater use at this site. The Army should submit a land use control implementation plan (LUCIP) to the Department within 45 days from the date of receipt of this letter.

The Department also notes that parcel 127(7) is listed in Table III.1 of the ADEM-JPA cleanup agreement as a site subject to a RCRA Facility Investigation (RFI). It appears that an RFI is no longer warranted and that the LUCIP submittal will represent the selected remedy for this parcel. The Department recommends that the JPA modify the cleanup agreement to reflect this change.

Response: Comments noted. The report was revised to include a recommendation for land-use controls (LUC) restricting groundwater usage.

Response to Fort McClellan Comments
Draft-Final Site Investigation Report, Former Washrack, Building 1740,
Soldier's Chapel, Parcel 127(7)

Comments from Bill Shanks dated August 16, 2002.

Comment 1: Page iv. Change 3-6 to 3-3 for Table 3-5 in the "Follows Page" column.
Rationale: Table 3-5 follows page 3-3 instead of 3-6.

Response: Agree, however, the table of contents is correct. Table 3-5 was misplaced and will be moved to follow Page 3-6 of the text.

Comment 2: Page 3-1, Line 14. Change "Figure 3-1" to "Figures 3-1 and 3-2".
Rationale: Figure 3-1 shows soil sample locations and Figure 3-2 shows groundwater sample locations; both figures should be referenced to include all sample locations.

Response: Agree. The text was revised per comment.

Comment 3: Figure 3-1. Change the figure to show PPMP-127-GP19 through PPMP-127-GP25 as locations where only surface soil samples were taken.
Rationale: Information elsewhere in the document (Tables 3-1, 3-2 and 3-3) indicate that only surface soil samples were taken at these locations but the symbol used on the figure for these locations indicates both surface and subsurface soil samples were taken.

Response: Agree. The figure was revised per comment.

Comment 4: Page 3-4, Line 32. Change "Appendix B" to "Appendix C".
Rationale: The boring logs for the wells are in Appendix C instead of Appendix B.

Response: Agree. The text was revised per comment.

Comment 5: Page 3-5, Line 30. Complete the sentence "After the grout cured for a minimum of 48 hours."
Rationale: The sentence is incomplete

Response: Agree. The text was reviewed and revised to complete the sentence.

Comment 6: Figure 4-1. Change the legend for monitoring wells to indicate the locations shown are for permanent monitoring wells or add the temporary monitoring well locations on the figure.
Rationale: The figure does not show the temporary monitoring wells installed at the site.

Response: Agree. The figure was revised per comment.

Comment 7: Page 5-6, Line 29. Change “where” to “were.”
Rationale: The word is misspelled.

Response: Agree. The text was revised per comment.